

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:     KEITH THOMAS HENCH  
          JESSE LEE HENCH

CHAPTER 13

Debtor(s)

JACK N. ZAHAROPOULOS  
CHAPTER 13 TRUSTEE  
Movant

CASE NO: 1-23-01246-HWV

vs.  
KEITH THOMAS HENCH  
JESSE LEE HENCH

Respondent(s)

**TRUSTEE'S MOTION TO DISMISS CASE**

AND NOW, on November 14, 2023, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee for the Middle District of Pennsylvania, through his attorney Douglas R. Roeder, Esquire, and respectfully represents the following:

1.   A Plan was filed on June 5, 2023.
2.   A hearing was held and an Order was entered on September 13, 2023 directing that an amended plan be filed within thirty (30) days.
3.   As of the date of this Motion, an amended plan has not been filed.
4.   The delay in filing a confirmable plan in this case is prejudicial to creditors.

WHEREFORE, your Trustee respectfully requests your Honorable Court dismiss the case upon the basis that Debtors have failed to propose a confirmable plan.

Respectfully submitted,

/s/ Douglas R. Roeder, Esquire  
Id: 80016  
Attorney for Movant  
Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
Suite A, 8125 Adams Drive  
Hummelstown, PA 17036  
Phone: 717-566-6097  
email: droeder@pamd13trustee.com

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: KEITH THOMAS HENCH  
JESSE LEE HENCH

Debtor(s)

CHAPTER 13

JACK N. ZAHAROPOULOS  
CHAPTER 13 TRUSTEE

Movant

CASE NO: 1-23-01246-HWV

KEITH THOMAS HENCH  
JESSE LEE HENCH

Respondent(s)

**NOTICE**

NOTICE IS HEREBY GIVEN that Jack N. Zaharopoulos, Standing Chapter 13 Trustee for the Middle District of Pennsylvania has filed a Motion to Dismiss for failure to file a confirmable Chapter 13 Plan.

YOU ARE HEREBY NOTICED that a hearing has been scheduled on this matter for:

Sylvia H. Rambo United States Courthouse  
Bankruptcy Courtroom 8, 4th Floor  
1501 North 6th Street  
Harrisburg, PA 17102

Date: December 20, 2023

Time: 09:35 AM

Any objection or response filed must be filed with the Clerk, U.S. Bankruptcy Court and served on the Chapter 13 Trustee.

Date: November 14, 2023

/s/ Douglas R. Roeder, Esquire

Id: 80016

Attorney for Trustee

Jack N. Zaharopoulos

Standing Chapter 13 Trustee

Suite A, 8125 Adams Dr.

Hummelstown, PA 17036

Phone: (717) 566-6097

email: [info@pamd13trustee.com](mailto:info@pamd13trustee.com)

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: KEITH THOMAS HENCH  
JESSE LEE HENCH

CHAPTER 13

Debtor(s)

JACK N. ZAHAROPOULOS  
CHAPTER 13 TRUSTEE  
Movant

CASE NO: 1-23-01246-HWV

vs.

KEITH THOMAS HENCH  
JESSE LEE HENCH

Respondent(s)

**CERTIFICATE OF SERVICE**

I certify that I am more than 18 years of age and that on November 14, 2023, I served a copy of this Motion to Dismiss, Notice and Proposed Order on the following parties by 1<sup>st</sup> Class mail from Hummelstown, PA, unless served electronically.

Served electronically

NICHOLAS G PLATT, ESQUIRE  
MOONEY LAW  
230 YORK STREET  
HANOVER, PA 17331

UNITED STATES TRUSTEE  
1501 NORTH 6TH STREET  
BOX 302  
HARRISBURG, PA 17102

Served by 1<sup>st</sup> Class Mail

KEITH THOMAS HENCH  
2116 CIRCLE ROAD  
CARLISLE, PA 17013

I certify under penalty of perjury that the foregoing is true and correct.

Date: November 14, 2023

/s/ Vickie Williams

Office of Standing Chapter 13 Trustee  
Jack N. Zaharopoulos  
Suite A, 8125 Adams Dr.  
Hummelstown, PA 17036  
Phone: (717) 566-6097  
email: [info@pamd13trustee.com](mailto:info@pamd13trustee.com)

**UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: KEITH THOMAS HENCH  
JESSE LEE HENCH

Debtor(s)

JACK N. ZAHAROPOULOS  
CHAPTER 13 TRUSTEE  
Movant

CHAPTER 13

KEITH THOMAS HENCH  
JESSE LEE HENCH

CASE NO: 1-23-01246-HWV

Respondent(s)

**ORDER DISMISSING CASE**

Upon consideration of the Trustee's Motion to Dismiss, it is hereby Ordered that the above-captioned bankruptcy be and hereby is dismissed. The Court retains jurisdiction to rule on any timely filed fee application.